

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JENNIFER HARRIS,

Plaintiff,

v.

FEDEX CORPORATION,

Defendant.

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CIVIL ACTION NO. 4:21-cv-1651

DEFENDANT FEDEX CORPORATE SERVICES, INC.'S WITNESS LIST

Will Call Based on our understanding of Plaintiff's case, Defendant FedEx Corporate Services, Inc. ("Defendant" or "FedEx Services") plans to call the following persons to testify at trial:

1. Brian Burchett, 10013 S. Trumbull Avenue, Evergreen Park, Illinois 60805; FedEx Services's policies and procedures that applied to sales professionals including Plaintiff, methods and process Managing Directors manage their Managers.

2. Mac Chonoles, 13 Vista Mirage Way, Rancho Mirage, California 92270-1906; will testify about Plaintiff's work history, discipline, termination, internal complaints of discrimination, and FedEx Services's policies and procedures that applied to Plaintiff.

3. Michael Clark, P.O. Box 241, Marion, Arkansas, 72364; will testify about Plaintiff's work history, discipline, termination, internal complaints of discrimination, FedEx Services' investigation of Plaintiff's internal complaints and FedEx Services's policies and procedures that applied to Plaintiff.

4. Jennifer Harris, c/o The Sanford Firm, 1910 Pacific Avenue, Suite 15400, Dallas, Texas 75201 will provide testimony that support FedEx's defenses.

5. Michelle Lamb, 91 N Berryline Circle, Spring, Texas 77381; will testify regarding Plaintiff's work history and job performance as a District Sales Manager, job coaching of Plaintiff, Plaintiff's performance improvement plans, discipline of Plaintiff and others in their District Sales Manager role, sales goals, and the reasons for Plaintiff's termination.

6. Diane Nuar, 3315 Village Oaks Drive, Kingwood, Texas, 77339; is a Licensed Professional Counselor who will testify regarding her evaluation of Plaintiff and her diagnosis (if any) of mental illness. She will also testify about her the conversations she had with Plaintiff during her treatment sessions.

7. Jimmy Van Epps, 1539 Popular Ridge Drive, Memphis, Tennessee 38120; will testify about FedEx's procedures regarding moving customers between sales professionals, sales professionals incentive compensation, information FedEx captures and uses to determine revenue goals and revenue attainment, revenue goals, attainments and other metrics for Michelle Lamb's team.

May Call Defendant may call the following witnesses at trial.

8. Kristi Castilow, 2135 Waterford Park Street, Missouri City, Texas 77459; may testify about Plaintiff's work history, discipline, termination, internal complaints of discrimination, and FedEx Services's policies and procedures that applied to Plaintiff.

9. Dave Russell, 70 Cherry Road, Memphis, Tennessee 38117; may testify regarding the reasons for Plaintiff's termination, FedEx Services's policies and procedures that applied to sales professionals including Plaintiff, methods and processes he expected his Managing Directors to follow in managing their Managers' performance.

10. Virginia Solgot, 14241 Rainer Peak Crossing, Conroe, Texas 77384; may testify regarding the performance of Plaintiff's sales team after Plaintiff's termination, testify about .

11. Thomas Connolly, 3510 Windgarden Cove, Memphis, Tennessee 38125; may testify will testify about FedEx's procedures regarding moving customers between sales professionals, sales professionals incentive compensation, FedEx Services' policies and procedures that applied to Sales professionals including Plaintiff.

12. Adrian Webster, 7746 Chappel Creek Parkway N, Cordova, Tennessee 38016; may testify regarding Plaintiff's work history, discipline, termination, internal complaint of discrimination and FedEx Services's policies and procedures that applied to Plaintiff.

13. Linda Taylor, 4055 Via Toledo Court, Kissimmee, Florida 34759; may testify regarding Plaintiff's work history, discipline, termination, internal complaint of discrimination and FedEx Services's policies and procedures that applied to Plaintiff.

14. Stacey Bullyan, 1240 Ala Kapuna, Apt. 310, Honolulu, Hawaii, 96819; may testify about Plaintiff's management style, working with Plaintiff, conversations the witness had with Plaintiff, FedEx policies and procedures for Account Executives and working at FedEx in general.

15. Neal Cross, 3601 Green Hollow Drive, Grand Prairie, Texas 75052; may testify about Plaintiff's management style, working with Plaintiff, conversations the witness had with Plaintiff, FedEx policies and procedures for Account Executives and working at FedEx in general.

16. Jennifer Garcia, P.O. Box 9084, The Woodlands, Texas 77387; may testify about Plaintiff's management style, working with Plaintiff, conversations the witness had with Plaintiff, FedEx policies and procedures for Account Executives and working at FedEx in general.

17. Lynn Hennessey, 18 N Goldenvine Circle, The Woodlands, Texas 77382; may testify about Plaintiff's management style, working with Plaintiff, conversations the witness had

with Plaintiff, FedEx policies and procedures for Account Executives and working at FedEx in general.

18. Emily Perkins Hineman, 15914 Crooked Lake Way S, Cypress, Texas 77433; may testify about Plaintiff's management style, working with Plaintiff, conversations the witness had with Plaintiff, FedEx policies and procedures for Account Executives and working at FedEx in general.

19. Joel Hitchcock, 605 Townsend Road, Zavalla, Texas 75980; may testify about Plaintiff's management style, working with Plaintiff, conversations the witness had with Plaintiff, FedEx policies and procedures for Account Executives and working at FedEx in general.

20. Byron Jackson, 2727 Revere Street #4019, Houston, Texas 77098; may testify about Plaintiff's management style, working with Plaintiff, conversations the witness had with Plaintiff, FedEx policies and procedures for Account Executives and working at FedEx in general.

21. Jason Murrell, 17647 Windy Point Drive, Spring, Texas 77379; may testify about Plaintiff's management style, working with Plaintiff, conversations the witness had with Plaintiff, FedEx policies and procedures for Account Executives and working at FedEx in general.

22. Christina Ortiz, 9702 N Sam Houston Parkway E, Apt. 1426, Humble, Texas 77396; may testify about Plaintiff's management style, working with Plaintiff, conversations the witness had with Plaintiff, FedEx policies and procedures for Account Executives and working at FedEx in general.

23. Laura Segovia, 1007 Locke Lane, Houston, Texas 77042; may testify about Plaintiff's management style, working with Plaintiff, conversations the witness had with Plaintiff, FedEx policies and procedures for Account Executives and working at FedEx in general.

24. Abraham Villesca, 14555 San Pietro Drive, Houston, Texas 77070; may testify about Plaintiff's management style, working with Plaintiff, conversations the witness had with Plaintiff, FedEx policies and procedures for Account Executives and working at FedEx in general.

25. Kathie Walthall, 5539 Derron Drive, Memphis, Tennessee, 38115; will testify regarding Plaintiff's work history, discipline, termination, internal complaint of discrimination and FedEx Services's policies and procedures that applied to Plaintiff.

26. Steve Whaley, 24032 Augusta Falls Lane, Spring, Texas 77389; may testify about Plaintiff's management style, working with Plaintiff, conversations the witness had with Plaintiff, FedEx policies and procedures for Account Executives and working at FedEx in general.

27. Miriam Zapata, 18518 Ranch View Trail, Houston, Texas 77073; may testify about her interactions with Plaintiff, Plaintiff's team and Michelle Lamb, may also testify about FedEx policies and procedures for Sales professionals and working at FedEx in general. .

28. Any witness designated by Plaintiff.

29. Additionally, Defendant reserves the right to call witnesses not listed to rebut any evidence offered by Plaintiff in his case in chief.

Additionally, Defendant reserves the right to call witnesses not listed to impeach or rebut the testimony of any witnesses' testimony at trial or any deposition testimony offered at trial.

Defendant also reserves the right to supplement or amend this witness list prior to trial.

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DATED: September 2, 2022

Respectfully submitted,

/s/ Christopher M. Ahearn
Barak J. Babcock
Tennessee Bar No. 024021
SD No. 2522941
ATTORNEY-IN-CHARGE

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document and the attachments referenced therein were filed with the Clerk of the Court using the CM/ECF system, which will send a copy to all attorneys of record.

s/Christopher M. Ahearn